

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

DORRELIEN FELIX and MARGALY  
FELIX, individually, and JONATHAN C.  
MOORE, as Administrator of the ESTATE  
OF DAVID FELIX,

Plaintiffs,

- against -

THE CITY OF NEW YORK, a municipal  
entity; HAROLD CARTER and  
VINCENTE MATIAS, individually and in  
their official capacities as New York City  
Police Detectives; the BRIDGE INC., a  
domestic not-for-profit organization; and  
JANE DOE (as of yet unidentified employee  
of the BRIDGE),

Defendants.

**DECLARATION OF  
LUNA DROUBI  
IN OPPOSITION TO  
DEFENDANT'S PARTIAL  
MOTION FOR SUMMARY  
JUDGMENT**

No. 16-cv-5845 (AJN)

LUNA DROUBI, an attorney duly admitted to practice law in the State of New York and  
in this court, declares under penalty of perjury:

1. I am a partner at Beldock Levine & Hoffman LLP, attorneys for Plaintiffs and am  
well-familiar with the facts of this case. I submit this declaration in opposition to Defendants  
Partial Motion for Summary Judgment pursuant to Fed. R. Civ. P. 56.

2. Annexed hereto are true and accurate copies of the following exhibits:

Exhibit 1: Excerpts from the August 28, 2018 Deposition of Tianna Penn

Exhibit 2: Excerpts from the May 23, 2018 Deposition of NYPD Detective Harold  
Carter

Exhibit 3: Excerpts from the September 25, 2018 Deposition of NYPD Detective  
Vincente Matias

Exhibit 4: I-Card Issued for David Felix dated April 24, 2015

- Exhibit 5: Excerpts from the Grand Jury Testimony of NYPD Detective Harold Carter
- Exhibit 6: Excerpts from the Grand Jury Testimony of NYPD Detective Vincente Matias
- Exhibit 7: Excerpts from the April 23, 2018 Deposition of Danielle Steeley, Employee of the Bridge
- Exhibit 8: Excerpts from the Grand Jury Testimony of Danielle Steeley, Employee of the Bridge
- Exhibit 9: Excerpts from the May 7, 2018 Deposition of NYPD Police Officer Deryk Blaire
- Exhibit 10: Excerpts from the April 23, 2018 Deposition of Maritza Bryson, Supervisor with the Bridge
- Exhibit 11: Residential Agreement between David Felix and the Bridge, Inc. dated October 10, 2014
- Exhibit 12: Surveillance Video Footage from the Bridge from April 25, 2015
- Exhibit 13: Excerpts from the May 15, 2018 Deposition of Melanie Wagner
- Exhibit 14: Color Photograph of Lobby Hallway of 538 East 6<sup>th</sup> Street with Ms. Wagner's mark-ups
- Exhibit 15: NYPD UMOS Firearms Discharge Powerpoint with Timeline
- Exhibit 16: Final Summary Report of Firearms Discharge Review Board Case #2015-26 dated August 2, 2017
- Exhibit 17: Excerpts of August 9, 2018<sup>1</sup> Deposition of Christina Ibanez
- Exhibit 18: Color Photograph of the Hallway of 538 East 6<sup>th</sup> Street from the Deposition of Christina Ibanez (Plaintiff's Deposition Exhibit 19)
- Exhibit 19: Color Photograph of the Apartment Building Located at 538 East 6<sup>th</sup> Street from the Deposition of Christina Ibanez (Plaintiff's Deposition Exhibit 20)

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<sup>1</sup> The Court Reporter mistakenly dated the deposition of Ms. Ibanez for August 9, 2017.

Exhibit 20: September 22, 2016 audio recording of the NYPD Internal GO-15 Interview with Vincente Matias

Exhibit 21: Excerpt of May 22, 2018 Deposition of NYPD Detective Kevin Brown

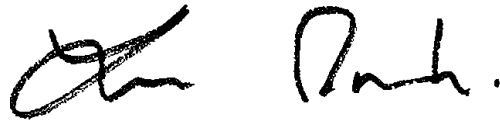
Exhibit 22: Floorplan of David Felix's Apartment at 538 East 6<sup>th</sup> Street, Apartment 6C

Exhibit 23: Expert Report of Lone Thanning, M.D., F.C.A.P., FACFE, DABFM, Diplomat, Anatomic and Forensic Pathology

Exhibit 24: December 3, 2018 Decision and Order from Cassandra Mullen

Dated: New York, New York  
February 4, 2019

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'Luna Droubi', written over a horizontal line.

Luna Droubi